

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
Consolidated Civil Action**

RALEIGH WAKE CITIZENS
ASSOCIATION, et al.

Plaintiffs,

v.

No. 5:15-cv-156

WAKE COUNTY BOARD
OF ELECTIONS,

Defendant.

CALLA WRIGHT, et al.,

Plaintiffs,

v.

No. 5:13-cv-607

THE STATE OF NORTH CAROLINA,
et al.,

Defendants.

DECLARATION OF FREDERICK G. MCBRIDE

NOW COMES Frederick G. McBride who deposes and says:

1. I am over 18 years of age, legally competent to give this declaration and have personal knowledge of the facts set forth herein.

2. From August 1, 2015, until July 31, 2016, I served as Senior Policy Analyst for the Southern Coalition for Social Justice in Durham, North Carolina. I also served as the Redistricting Coordinator at the American Civil Liberties Union – Voting Rights Project for 12 years. I have drawn district maps, evaluated redistricting plans, and performed voting and demographic analysis for over 100 jurisdictions in 22 states.

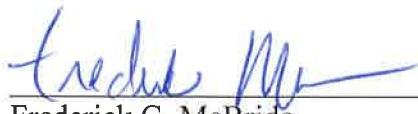
3. Anita Earls sent me the cover letter attached hereto as Exhibit A on August 3, 2016 along with all of the electronic GIS files accompanying the letter. The letter indicated that the software program, Maptitude, or some similar program was needed to open the files.

4. I began the standard practice of importing a plan from an equivalency file, area layer, or existing plan as the letter indicated such files were block assignment files. This technique involves importing the district plan using the district ID for each map feature in the base layer.

5. My GIS program is Maptitude for Redistricting 2013. In Maptitude, files must be dBase, comma-delimited text, fixed-format text, or fixed-format binary files. The files associated with the letter had .gdb, .mxd, and .rdp extensions. These types of files are associated with ArcGIS, an ESRI product not compatible with their competitor Maptitude. I was unable to import these files into the Maptitude program to perform any evaluation of the districts or the purported district statistics.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this the 5th day of August, 2016.



Frederick G. McBride

Ogletree Deakins

OGLETREE, DEAKINS, NASH,
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August 3, 2016

Via Hand Delivery

The Honorable Julie R. Johnston
Clerk of Court
U.S. District Court Eastern District of North Carolina
310 New Bern Avenue
Raleigh, North Carolina 27611

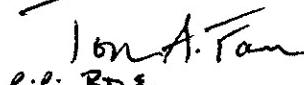
Re: *Raleigh Wake Citizens Assoc., et al., v. Wake Co. Bd. of Elections, et al.*
Case Nos. 5:15-CV-156 & 5:13-CV-607

Dear Clerk Johnston:

We represent the North Carolina House of Representatives, Tim Moore, and the President Pro Tem of the North Carolina Senate, Phil Berger. We are providing the enclosed USB flash drive at the direction of the Court. It contains the bloc assignment files for two illustrative districting plans electronically filed by Speaker Moore and President Pro Tem Berger earlier today. These files could not be electronically filed using the Court's ECF system due to formatting issues. Accordingly, copies of this USB flash drive are simultaneously being hand delivered to counsel for all parties to this matter.

The Court will need to have access to a software program called Maptitude, or a similar GIS-based redistricting program, to open the files. Should the Court so desire, our clients will make available to it a computer with these capabilities. Likewise, a member of the General Assembly's professional, non-partisan staff can assist the Court in accessing and evaluating the information.

Very truly yours,


P.P. Boe
Thomas A. Farr

cc: Charles Marshall (w/ enc)
Anita Earls (w/ enc)

Exhibit A